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DUE
DATE

ACTION

DIST. LTR ENC

BENEDETTI, R.L.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
BENJAMIN, A.		
BERMAN, H.S.		
CARNIVAL, G.J.		
COPP, R.D.		
CORDOVA, R.C.		
DAVIS, J.G.		
FERRERA, D.W.		
HANNI, B.J.		
HEALY, T.J.		
HEDAH, T.G.		
HILBIG, J.G.		
KIRBY, W.A.		
KUESTER, A.W.		
LEE, E.M.		
MANN, H.P.		
MARX, G.E.		
MCKENNA, F.G.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.		
RILEY, J.H.		
SANDLIN, N.B.		
SATTERWHITE, D.G.		
SCHUBERT, A.L.		
SETLOCK, G.H.		
SHEPLER, R.L.		
SULLIVAN, M.T.		
SWANSON, E.R.		
WILKINSON, R.B.		
WILSON, J.M.		
ZANE, J.O.		

Keith S X X

Ferrier D X X

Taylor K X X

CORRES CONTROL	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Reviewed for Addressee
Corres. Control RFP

7-6-93
DATE BY

Ref Ltr. #

COLORADO DEPARTMENT OF HEALTH

Dedicated to protecting and improving the health and
environment of the people of Colorado

4300 Cherry Creek Dr. S. Laboratory Building
Denver, Colorado 80222-1530 4210 E. 11th Avenue
Phone (303) 692-2000 Denver, Colorado 80220-3716
(303) 691-4700

June 24, 1993

Mr. Richard J. Schassburger
U.S Department of Energy
Rocky Flats Plant
Building 116
P. O. Box 928
Golden, Colorado 80402-0928

RE: COMMENTS; Draft Appendix E, Quality Assurance Addendum (QAA) to
IM/IRA Decision Document (Building 910) for the Solar
Evaporation Ponds (OU-4), submitted April 20, 1993

Dear Mr. Schassburger:

The Colorado Department of Health, Hazardous Materials and Waste
Management Division (the Division) has reviewed the subject document
submitted by DOE and prime contractor, EG&G. The Division's comments
are attached.

The Division, as lead regulatory agency, hereby grants conditional
approval to the subject QAA. The comments must be satisfactorily
resolved and the QAA issued in final form before full approval will
be granted. Please submit a revised document by July 26, 1993.

If you have any questions concerning the attached comments, please
call Harlen Ainscough of my staff at 692-3337.

Sincerely,

Gary W. Baughman

Gary W. Baughman, Chief
Facilities Section
Hazardous Waste Control Program

Attachments

cc: Daniel S. Miller, AGO
Jackie Berardini, CDH-OE
Martin Hestmark, EPA
Arturo Duran, EPA
Frazer Lockhart, DOE
Scott Surovchek, DOE
Ernie O'Toole, DOE
Steve Keith, EG&G
Don Ferrier, EG&G

20695
STATE OF COLORADO



Roy Romer
Governor

Patricia A. Nolan, M
Executive Director

JUL 6 3 16 PM '93

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

ADMIN RECORD

Colorado Department of Health
Hazardous Materials & Waste Management Division

Comments

on

DRAFT

Appendix E

Quality Assurance Addendum

to

IM/IRA Decision Document

(Building 910)

for

SOLAR EVAPORATION PONDS

(OU-4)

ROCKY FLATS PLANT

submitted

April 20, 1993

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General Comment:

This document would greatly benefit from an Acronyms List. An annotated list, explaining the roles of internal organizations or protocols would be helpful. For example what is COEM or IWCP and what does it or they do?

Specific Comments:

Section 6.3.2.8: In consultation with Richard Fox of the Air Pollution Control Division (APCD) of the Colorado Department of Health, the Hazardous Materials and Waste Management Division (HMWM) has learned that operation of the evaporators for only 110 days per year, is an enforceable APCD Emission Permit condition. This limitation of operational hours was placed on the permit because DOE did not choose to obtain a Prevention of Significant Deterioration (PSD) permit. The PSD permit requires, at a minimum, one year of ambient monitoring data. In this case for oxides of nitrogen (NOx), since operating at potential levels would create NOx emissions which would trigger PSD requirements. DOE determined

ADMIN RECORD

it was more feasible to restrict the hours of operation, thus reducing the NOx emissions below the level requiring a PSD permit. HMMWD understands that DOE could perform air monitoring and seek a PSD permit which, if approved, would allow Building 910 to operate year-round on demand. Since the permit process would take more than a year from the date of submission of the PSD permit application, the Division supports use of the present approach to allow timely start-up of Building 910; however, limiting Building 910 to 110 days per year is not sanctioned in the IM/IRA Decision Document. DOE must take the necessary steps to ensure that the full capacity of Building 910 is available to process Interceptor Trench and Solar Pond waters as needed. Looking ahead, Building 910 may be suitable for other uses and it may be appropriate for DOE to ensure the full capacity by seeking the PSD permit from APCD.

Section 6.12: The Division does not believe that daily or periodic calibration requirements can be assured by placing stickers on the instruments. The Metrology Lab Calibration List which identifies calibration requirements and frequencies should include a calibration record that indicates the date, time and the individual who performed the calibration to ensure that the requirements were met.